## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI OXFORD DIVISION

KAREN HUGHEY, Conservator for JAMES ALLEN HUGHEY

**PLAINTIFF** 

v. CIVIL ACTION NO.: 3:18-CV-00004-GHD-RP

TIPPAH COUNTY, MISSISSIPPI; TOMMY MASON, In his Individual Capacity

**DEFENDANTS** 

## **NOTICE OF INTENT**

**PLEASE TAKE NOTICE** that the Defendant, Tippah County, Mississippi, by and through counsel, on October 30, 2024, has caused to be issued a subpoena *duces tecum* (a copy of which is attached as Exhibits "A" through "F") on the following:

Tippah County Hospital 1005 Highway 15 North Ripley, MS 38663

Regional One Health 877 Jefferson Avenue Memphis, TN 38103

Magnolia Regional Health Center 611 Alcorn Drive Corinth, MS 38834

Baptist Memorial Hospital - North Mississippi 1100 Belk Blvd. Oxford, MS 38655

Baptist Memorial Hospital - Union County 200 Highway 30 West New Albany, MS 38652

Benton Medical Center 15921 Boundary Drive Ashland, MS 38603

# **RESPECTFULLY SUBMITTED**, this the 30th day of October, 2024.

# JACKS GRIFFITH LUCIANO, P.A.

By: /s/ Arnold U. Luciano

Arnold U. Luciano, MS Bar No. 99198 Bethany A. Tarpley, MS Bar No. 104134 Daniel J. Griffith, MS Bar No. 8366 Attorneys for Defendant, Tippah County, Mississippi

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#### **CERTIFICATE OF SERVICE**

I, Arnold U. Luciano, attorney of record for Defendant, Tippah County, Mississippi, hereby certify that I have this day caused a true and correct copy of the above and foregoing *Notice of Intent* to be delivered by the ECF Filing System to the following Counsel of Record:

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## **Attorney for Plaintiff**

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**Attorneys for Defendant, Tommy Mason** 

**DATED**, this the 30th day of October, 2024.

/s/ Arnold U. Luciano
Arnold U. Luciano